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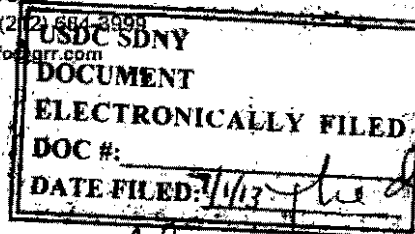
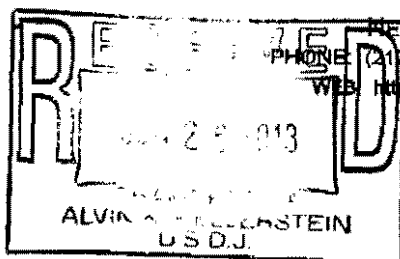
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June 25, 2013

**VIA FACSIMILE (212) 805-7942**

Honorable Alvin K. Hellerstein  
Room 1050  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: **Knoll, Inc. v. Regency Seating, Inc. et al.**  
**12-cv-0921-AKH**

*I agree to be  
does not have to be  
produced, and her's  
returned to GOTTLIEB,  
Rockman  
6-28-13  
Alc Heller*

Dear Judge Hellerstein:

Further to yesterday's hearing in the above referenced matter, enclosed please find the unredacted copy of the document requested by the Court. A redacted copy of the document is also enclosed.

It is Knoll's position that the redacted portions of the document are not in furtherance of any fraud and therefore production should not be ordered, for the following reasons.

First, the document is a privileged document as the writer, Carla Vrsansky, is an attorney at Buchanan Ingersoll who represents Knoll and was writing to Knoll executives and giving legal advice.

Second, the document is dated August 16, 2002, which is at least thirteen months before the filing of the trademark applications in question. Thus, any connection between the information in this e-mail and the filing of the applications is remote and speculative.

Third, and incorporating our prior arguments to the Court, there is no basis for finding that this document is in furtherance of any fraud.

Honorable Alvin K. Hellerstein  
June 25, 2013  
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Counsel is available for a phone conference to address this matter.

Respectfully submitted,

GOTTLIEB, RACKMAN & REISMAN, P.C.

A handwritten signature in black ink, appearing to read 'G. Gottlieb' with a stylized flourish at the end.

George Gottlieb  
ggottlieb@grr.com

GG/MPM

Encl.

cc: Michael J. Freno, Esq. (via facsimile w/o encls.)  
Michelle Mancino Marsh, Esq. (via facsimile w/o encls.)  
Marc P. Misthal, Esq.